



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region Portland Office

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5263

FAX (503) 229-6945

TTY (503) 229-5471

April 5, 2016

Melissa Peterson
Legal Counsel
Sulzer Pumps (US) Inc.
800 Koomey Road
Brookshire, TX 77423

Sent via e-mail: Melissa.Peterson@sulzer.com

RE: Revised Work Plan
Additional Source Control Evaluation Activities
ECSI #1235

Dear Ms. Peterson:

The Oregon Department of Environmental Quality (DEQ) reviewed the above-referenced work plan, submitted on your behalf by Geodesign, Inc. and dated March 21, 2016. DEQ's comments are provided below.

DEQ Comments

1. Source Tracing and Catch Basin Sediment Sampling

In the event there is insufficient sediment mass for all proposed analyses, the analyses should be prioritized. DEQ suggests the following hierarchy for analytical priority:

- PCBs
- metals,
- PAHs/phthalates

In the event limited sediment is available from a single catch basin, a composite sampling between two or more adjacent catch basins should be considered.

2. Stormwater Sampling

Sulzer proposed two stormwater sampling events in the draft work plan. In the revised plan only one event is specified. DEQ's previous comment #3 with regard to stormwater sampling and frequency was not intended to reduce sampling events. Typically, a minimum of four rounds is required to demonstrate source control. After two sampling rounds DEQ will assess the merits of reducing the number of rounds based on a request which lays out the data and lines of evidence for why less than four rounds is appropriate. DEQ recommends that a stormwater sample be collected reasonably soon after line cleanout (provided an event meeting stormwater sampling criteria is available). A subsequent minimum of one additional sample will need to be collected at least 3 months after cleanout to see if contamination levels increase, decrease, or remain steady. To



accommodate this schedule the second sampling event will likely need to be completed during the initial rainfall event in 2016 that meets sampling criteria.

3. Reporting

- a. Please include photodocumentation of relevant field observations/conditions.
- b. Please compare data to both Portland Harbor SLVs and most current PRGs.

Closing

Please submit a revised work plan that incorporates changes to address these comments. Should you have any questions please contact me at pugh.mark@deq.state.or.us or 503 229-5587.

Sincerely,



Mark Pugh, R.G.
Project Manager
DEQ Northwest Region Cleanup and Tanks Program

cc via e-mail: Eva Demaria, EPA Region 10 (demaria.eva@epa.gov)
Matt McClincy, DEQ (mcclincy.matt@deq.state.or.us)
Alex Liverman, DEQ (liverman.alex@deq.state.or.us)
Steve Nelson, Geodesign (snelson@geodesigninc.com)
Kim Cox, Portland BES, (kim.cox@portlandoregon.gov)